



MONTANA
TELECOMMUNICATIONS
ASSOCIATION



May 4, 2011

Marlene Dortch, Secretary
Federal Communications Commission
334 12th Street, SW
Washington, D.C.

In the Matter of

A National Broadband Plan for Our Future
Lifeline and Link Up Reform and
Modernization
Lifeline and Link-Up

GN Docket No. 09-51
WC Docket No. 11-42

WC Docket No. 03-109

Dear Ms. Dortch,

On April 28, 2011, Ms. Betty Buckley, Executive Vice President of the Washington Independent Telecommunications Association (WITA) and Geoff Feiss, General Manager of the Montana Telecommunications Association (MTA) met with Trent Harkrader, Kim Scardino, Amy Bender and Alex Minard of the Telecommunications Access Policy Division.

Ms. Buckley and Mr. Feiss noted that currently the ETCs in Montana absorb the \$3.50 per-customer State Lifeline support end-user charge; but the Montana Public Service Commission staff and Montana ETCs are concerned that if the cost of implementing proposed Lifeline reforms falls on states or ETCs to absorb, the ETCs may need to recover the increased costs by passing the \$3.50 charge to consumers, defeating the purpose of the Low Income program by raising rates. Mr. Feiss also noted that other proposed reforms in the Low Income NPRM (e.g., eligibility standards, coordinated enrollment, *inter alia*.) may necessitate state statutory amendments which would be difficult to realize. Montana Commission staff had expressed similar concerns.

Ms. Buckley and Mr. Feiss supported proposals to limit duplicate support and to strengthen verification and suggested a national database may be the most cost effective means of preventing wasteful low income support without increasing burdens on ETCs or states.

Respectfully submitted,

/s/

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/s/

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